

# McKool Smith

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July 9, 2024

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2270  
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen  
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

Following the conference before the Court on May 21, 2024, the parties have conferred and have agreed to adjustments of various dates for continuation of the above-referenced litigation.

These agreements are set out in the attached proposed Orders.

The first provides for various dates for the completion of expert discovery. Under the proposed schedule, all discovery would be completed by October 4, 2024.

The second extends by another six months the time limit for the filing of the affidavit of confession of judgment at issue in this case. By agreement of the parties, the Court had previously extended the date through December 10, 2024 (ECF No. 71). The proposed Order extends this date through June 10, 2025.

Counsel for Skatteforvaltningen and Luke McGee have reviewed this letter and, based on my communications with them, I can represent that all parties consent to the entry of both proposed Orders.

Respectfully submitted,

/s/

Daniel W. Levy

Encl.

cc: All Counsel (by ECF)

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